

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: TREASURIES SECURITIES AUCTION
ANTITRUST LITIGATION

MDL No. 2673
Master Docket
No. 1:15-MD-02673-PGG

This Document Pertains To:

ALL CASES

**STIPULATION AND [PROPOSED] ORDER REGARDING
VOLUNTARY DISMISSAL OF DEFENDANT CREDIT SUISSE INTERNATIONAL**

WHEREAS, Plaintiffs filed a consolidated class action complaint on November 16, 2017 (the “Consolidated Complaint”), a corrected version of which was filed on December 29, 2017 (ECF 226), in the above-captioned action, which named Credit Suisse International (“CSI”) as a defendant;

WHEREAS, Plaintiffs filed an amended consolidated class action complaint on May 14, 2021 (the “Amended Complaint”) (ECF 381) in the above-captioned action, which names CSI as a defendant;

WHEREAS, undersigned counsel for Defendants CSI and Credit Suisse Securities (USA) LLC has represented that:

- CSI is incorporated in the United Kingdom and has its principal place of business in the United Kingdom.
- CSI has no branches, offices, or employees in the United States.
- None of CSI’s revenue is attributable to the United States.
- None of the Credit Suisse employees identified in the Amended Consolidated Class Action Complaint were employees of CSI.

- CSI is not a primary dealer in United States Treasury securities.
- CSI does not have a United States Treasuries desk and, with the exception of hedging transactions and responding to voice or RFQ requests for non-U.S. clients, CSI does not sell United States Treasuries directly to customers.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED:

Pursuant to Federal Rule of Civil Procedure 41(a)(1), Plaintiffs hereby voluntarily dismiss all claims against CSI without prejudice to reassert such claims against CSI at a later time should evidence arise in discovery or otherwise that reveals information providing a basis for joining CSI on the claims being litigated in this case, and the Parties agree that any statute of limitations, statute of repose, or other time-related defense or claim shall be tolled as to CSI, only such that any claim will be deemed to have been filed on November 16, 2017, the filing date of the Consolidated Complaint, and which tolling shall extend until the earlier of the final adjudication (after all appeals) of the dismissal of this action or the conclusion of fact discovery in this action. The Parties also agree that CSI will not assert a statute of limitations or statute of repose defense based on this dismissal without prejudice or the time period excluded by the tolling agreement herein.

DATED: July 16, 2021

SO ORDERED,

_____, 2021

Hon. Paul G. Gardephe
United States District Judge



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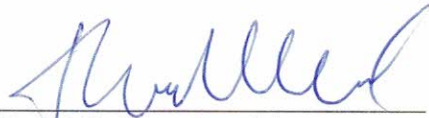
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